

### **REMARKS**

Applicants thank the Examiner for the very thorough consideration given the present application.

Claims 1-24 are now present in this application. Claims 1, 11, 14, 15, and 20 are independent. By this Amendment, claims 1, 3, 5, 11, and 14 have been amended.

Reconsideration of this application, as amended, is respectfully requested.

### **Reasons for Entry of Amendments**

At the outset, it is respectfully requested that this Amendment be entered into the Official File in view of the fact that the amendments to the claims automatically place the application in condition for allowance.

This Amendment was not presented at an earlier date in view of the fact that Applicants did not fully appreciate the Examiner's position until the Final Office Action was reviewed.

### **Information Disclosure Citation**

Applicants thank the Examiner for considering the references supplied with the Information Disclosure Statement filed July 5, 2007, and for providing Applicants with an initialed copy of the PTO-SB08 form filed therewith.

### **Drawings**

The Office Action indicates that the drawings are accepted by the Examiner. Therefore, no further action is necessary at this time.

### **Restriction Requirement**

The Examiner has issued a Restriction Requirement between newly added claims 15-24, which are directed to a method for operating a laundry machine, classified in class 8, subclass 158, and the original claims, and new claims 8-14, are classified in class 68, subclass 5C. Because Applicants have received an action on the merits for the originally presented claims, the Examiner has withdrawn claims 15-24 from further consideration. Applicants reserve the right to file a

divisional application directed to claims 15-24 at a later date if so desired.

**Rejections under 35 U.S.C. §103**

Claims 1, 2, and 8-14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Nakamura in view of Morton. Further, claims 3-7 stand rejected under 35 USC §103(a) as being unpatentable over Nakamura in view of Morton and further in view of De Loach. These rejections are respectfully traversed.

Complete discussions of the Examiner's rejections are set forth in the Office Action, and are not being repeated here.

While not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 1 has been amended to recite a combination of elements in a steam generator for a laundry machine including "a container provided with a water supply port to supply water and a steam exhaustion port to exhaust steam", "a heater to heat the water supplied into the container", and "a drain unit having an inlet to drain water inside of the container to a level below a water supply level."

Similarly, while not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 11 has been amended to recite a combination of elements in a laundry machine including a laundry tub, a laundry drum located inside the laundry tub, a steam generator, and means for spraying the exhausted steam directly into the laundry drum. The steam generator includes "a container provided with a water supply port to supply water and a steam exhaustion port to exhaust steam", "a heater to heat the water supplied into the container", and "a drain unit having an inlet to drain water inside of the container to a level below a water supply level."

Finally, while not conceding the appropriateness of the Examiner's rejection, but merely to advance prosecution of the instant application, Applicants respectfully submit that independent claim 14 has been amended to recite a combination of elements in a laundry machine including a laundry drum, a steam generator, and means for spraying the exhausted

steam directly into the laundry drum. The steam generator includes “a container provided with a water supply port to supply water and a steam exhaustion port to exhaust steam”, “a heater to heat the water supplied into the container”, and “a drain unit configured to drain water inside of the container to a level below a water supply level and to drain substantially all the water inside of the container outwardly.”

Applicants respectfully submit that these combinations of elements as set forth in independent claims 1, 11, and 14 are not disclosed or made obvious by the prior art of record, including Nakamura, Morton, and De Loach.

The Examiner states that Nakamura fails to disclose a drain, but that it would have been obvious to one of ordinary skill in the art to modify Nakamura with a drain pipe taught by Morton. The Examiner asserts that Morton shows a drain with an upper inlet in the vicinity of 40, and water in the container, that enters this inlet, drains to a level below the upper inlet, specifically in the vicinity of 36. In addition, the Examiner asserts that Morton’s drain operates like a siphon, with the water flowing from the higher opening out of the lower opening. Applicants respectfully disagree.

The stand-pipe member 34 includes an open end 38 that allows for water to drain into it in case of a malfunction of the water make-up valve, and when the water level reaches the top of the aperture 40, the water make-up valve closes and stops the flow of water into the container. Once the water in the container reaches the aperture 40, the water drains through the stand-pipe member 34 into the sewer drain 41 until the water level is even with the bottom of the aperture 40, and then the heater element is energized. This means that a water supply level in Morton is the water level corresponding to the bottom of the aperture 40 and, as such, the water can only be drained until the level of the water corresponds to the bottom of the aperture 40.

In other words, the aperture 40 is for sensing the water supply level and for draining the water until the water level is even with the bottom thereof. Therefore, it is apparent that the aperture 40 cannot drain to the level below the bottom of the aperture, which defines the water supply level. As such, the aperture 40 does not operate like a siphon.

Further, even though Morton describes the water drained through the aperture 40 exits container 12 via the stand-pipe member 34 extending through the face plate at region 36, this does not mean that the water level in the container is drained to the level of region 36. Therefore, even if

one or ordinary skill in the art were motivated to combine Nakamura and Morton, the hypothetical combination would fail to teach all features of independent claim 1.

De Loach was cited for teaching a drain cap to further modify the combination of Nakamura and Morton. However, this does not correct the deficiencies identified above with respect to Nakamura and Morton and therefore, independent claims 1, 11, and 14 should be allowed.

Furthermore, regarding independent claim 14, the hypothetical combination of Nakamura and Morton fails to teach a drain unit configured to “to drain substantially all the water inside of the container outwardly.” The Examiner asserts that it “is well known that if it is desired to drain all fluid from a system, to locate the drain inlet at the bottom of the tank or receptacle, such as in a common sink.” However, this modification of Morton’s aperture 40 would defeat the operation of Morton in that the water would constantly drain and the heater element would never be energized. Any rearranging of the location of the aperture 40 in Morton would defeat the purpose of aperture 40 and would not provide the claimed configurations that require the water to be drained below a water supply level.

With regard to dependent claims 2-10, 12, and 13, Applicants submit that claims 2-10, 12, and 13 depend, either directly or indirectly, from one of independent claims 1 and 11, which are allowable for the reasons set forth above, and therefore claims 2-10, 12, and 13 are allowable based on their dependence from one of claims 1 and 11. Reconsideration and allowance thereof are respectfully requested.

### **CONCLUSION**

All of the stated grounds of rejection have been properly traversed, accommodated, or rendered moot. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. It is believed that a full and complete response has been made to the outstanding Office Action, and as such, the present application is in condition for allowance.

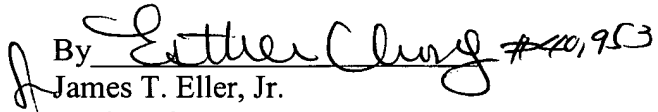
If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone Chad D. Wells, Registration No. 50,875, at (703) 205-8000, in the Washington, D.C. area.

Prompt and favorable consideration of this Amendment is respectfully requested.

If necessary, the Commissioner is hereby authorized in this, concurrent, and future replies, to charge payment or credit any overpayment to Deposit Account No. 02-2448 for any additional fees required under 37 C.F.R. §§ 1.16 or 1.17; particularly, extension of time fees.

Dated: February 25, 2008

Respectfully submitted,

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